

ORIGINAL

United States District Court
NORTHERN DISTRICT OF GEORGIA

FILED IN CHAMBERS
U.S.D.C. Atlanta

JUL 07 2016

JAMES N. HATTEN, Clerk
By: *K. Saluse*
Deputy Clerk

UNITED STATES OF AMERICA

v.

CRIMINAL COMPLAINT

Case Number: 1:16-MJ-0573

Jeef Bonhomme

I, the undersigned complainant being duly sworn, state the following is true and correct to the best of my knowledge and belief. On or about June 16, 2016 in Fulton County, in the Northern District of Georgia and elsewhere, defendant(s) did, knowingly deposit, or cause to be deposited, in a post office or authorized depository for mail matter, to be sent or delivered by the Postal Service, according to the direction thereon, a communication, with or without a name or designating mark subscribed thereto, addressed to another person, which contained a threat to kidnap any person or a threat to injure the person of the addressee or of another,

in violation of Title 18, United States Code, Section(s) 876(c).

I further state that I am a(n) Postal Inspector and that this complaint is based on the following facts:

PLEASE SEE ATTACHED AFFIDAVIT

Continued on the attached sheet and made a part hereof. Yes

Jared Williams

Signature of Complainant
Jared Williams

Based upon this complaint, this Court finds that there is probable cause to believe that an offense has been committed and that the defendant has committed it. Sworn to before me, and subscribed in my presence

July 7, 2016

Date

at Atlanta, Georgia

City and State

JANET F. KING
UNITED STATES MAGISTRATE JUDGE

Name and Title of Judicial Officer

AUSA Mary C. Roemer / Enter USAO/LIONS No.

Janet F. King

Signature of Judicial Officer

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Jared Williams, being duly sworn, depose and state as follows:

Introduction

1. I am a United States Postal Inspector and have been so employed since February 2015. I am assigned to the U.S. Postal Inspection Service's Mail Theft External Crimes Team, at the Atlanta, GA Field Office. My job duties are to investigate crimes committed against the United States Postal Service, its customers, employees, and infrastructure; and or use of the U.S. mail with violations related to the Mail Theft Statute, 18 U.S.C. Section 1708. As a federal agent, I have participated in and conducted investigations involving violations of federal criminal laws. I am authorized to investigate violations of laws of the United States and to execute warrants issued under the authority of the United States, pursuant to 18 U.S.C. § 3061.

2. This affidavit is submitted in support of a Criminal Complaint for the arrest of **JEEF BONHOMME**, for the offense of mailing threatening communications, 18 U.S.C. Section 876(c). As set forth herein, there is probable cause to believe that on or about June 16, 2016, **JEEF BONHOMME** did knowingly deposit, or caused to be deposited, in any post office or authorized depository for mail matter, to be sent or delivered by the Postal Service, according to the direction thereon, any communication, with or without a name or designating mark subscribed thereto, addressed to any other person containing any threat to kidnap any person or any threat to injure the person of the addressee or of another, in violation of Title 18, United States Code, Section 876(c). The information contained in this affidavit is based on my training and experience, my personal participation in this investigation and information provided to me by other law enforcement officials and/or the U.S. Attorney's Office. Unless otherwise indicated, where I have referred to written or oral statements, I have summarized them in substance and in part, rather than

verbatim. Not all of the facts of the investigation known to me are contained herein, only those necessary to establish probable cause.

Statement of Probable Cause

3. On July 6, 2016, the U.S. Postal Inspection Service, Atlanta Field Office, was notified by the U.S. Attorney's Office, Northern District of Georgia, that it had been made aware of threatening handwritten letters from an individual who identified himself as **JEEF BONHOMME** sent to employees of the U.S. Food and Drug Administration (FDA) located at 60 8th Street, N.E., Atlanta, GA 30309. **JEEF BONHOMME** is currently being held by the United States Marshals Service at a facility in the Atlanta, Georgia area. At the time of the allegations referenced in the complaint, **JEEF BONHOMME** was being housed at the U.S. Federal Bureau of Prisons, Federal Medical Center in Butner, N.C. for evaluation; he is being held on charges brought against him by the Federal Protective Service on violation notices issued related to conduct that occurred at the FDA building located at the 60 8th Street, N.E., Atlanta, GA 30309.
4. **JEEF BONHOMME** was formally employed by the FDA as a Chemist. On September 29, 2015, while employed by the FDA, **JEEF BONHOMME** was placed on administrative leave while under investigation for sexual harassment of a coworker; he was immediately banned from the property located at 60 8th St N.E, Atlanta, GA 30309. **JEEF BONHOMME** was cited on September 30, 2015, for violations of Disorderly Conduct and Failure to Conform with Signs and Directions, by the Federal Protective Service, for conduct that occurred on that date at the FDA property located at 60 8th Street, N.E., Atlanta, GA 30309. **JEEF BONHOMME** appeared before Judge Janet F. King on October 1, 2015, and was released on bond with conditions to stay away from the Atlanta FDA facility at 60 8th Street, N.E.,

Atlanta, GA 30309.

5. On October 5, 2015, **JEEF BONHOMME** was arrested by Federal Protective Services for a second time at the Atlanta FDA Property, 60 8th St N.E, Atlanta, GA 30309, for violations of Disorderly Conduct and Failure to Conform to Signs and Directions. **JEEF BONHOMME** appeared before Judge Janet F. King on October 6, 2016, and was detained as a danger to the community. A psychiatric examination and restoration order was later issued on November 2, 2015, for an evaluation of **JEEF BONHOMME** at the U.S. Federal Bureau of Prisons, Federal Medical Center in Butner, N.C., or a comparable facility.
6. On or about October 14, 2015, **JEEF BONHOMME** was issued a letter of termination from the FDA with an effective date of October 30, 2015.
7. While being held at the U.S. Federal Bureau of Prisons, Federal Medical Center in Butner, N.C., **JEEF BONHOMME** sent threatening handwritten letters to the Atlanta FDA located at 60 8th St N.E., Atlanta, GA 30309. In one envelope, postmarked June 16, 2016, addressed to "F.O. U.S. FDA-Tobacco, 60 8th St NW, Atlanta, GA 30309" with a return address of "Bonhomme, Jeef 67231019 Federal Medical Center P.O. Box 1600, Butner, NC 27509, he included three hand written letters with threatening communications addressed to "M.H." (Investigations)", "L.M.", and "Female Security Officer w/ Dread Locks". The letters to "F.O.," "M.H." and "L.M." were addressed using the full name of the FDA employees. Details from the letters are as follows.
 - A. The first letter in the envelope sent from **JEEF BONHOMME** was addressed to "M.H. (Investigations)". Statements were made about kidnapping, with descriptive sexual explicit statements that would cause bodily harm. Excerpts from the letter addressed to "M.H." are as follows:

“Dear sweet sweet M[name withheld],

“with your fine ass, I want to kidnap you and keep yo, no ransom is worth your price. I’d keep you locked up butt naked in my sex room.”

“I wanna tie you up, hand and legs, spread wide open and apart, helplessly bound. And hame my way with you. I’d Fuck you and fuck you and fuck you again, mercilessly.”

“Then I’d put a tape over your mouth, cuz I wanna hear your grunt.”

“As I scramble your ovaries, I’d impregnate you with 10 twins (decelets).”

B. The second letter in the envelope sent from **JEEF BONHOMME** was addressed to “L.M.” Statements described explicit sexual acts that would cause bodily harm. Excerpts from the letter addressed to “L.M.” are as follows:

“Dear L[name withheld],

I’ve been locked up for almost 9 months...and you’ve been on my mind, and not for good thinsgs.”

“A woman like you deserves to walk around with no clothes. I should put a leash around you neck and make you call me Master.”

“For my pleasure, I’d tie you up naked, stretched out and spread doggy treats all over you...then I would let loose 4 rotweilers to enjoy the treat. If you got mad, I’d slap you

until you smiled. After you smiled I'd make you suck my cock to the deepest part of your throat. "

"Also, if you slow down or get lazy, I'd switch the shit out of that ass til it became red like cinder ... "

"God Forgives, I Don't"

C. The third and final letter in the envelope sent from **JEFF BONHOMME** was addressed to "Female Security Officer w/ Dread Locks". Descriptive sexual explicit statements were made in the letter that would cause bodily harm. Excerpts from the letter addressed to "Female Security Officer w/ Dread Locks" are as follows, along with his name in closing:

*"This Letter is for the female security officer with the dreads,
You've been on my mind heavily these past few weeks, so I got a notepad to make sure I got to tell you everything I'm gonna do to you. If you don't' like it, call 911, but I'll be back, still on a mission for my favorite woman. "*

"As you lose control, and with my cock in your mouth, you moan out pleaurably, and at a high pitch, "I'm cumming Jeef, I'm cumming."As I enjoy your taste, I pretend to not hear you and I keep sucking the shit out that pussy, and faintly you moan out to me that you're cumming, and again what you say doesn't matter. I respond and tell you to shut up and to keep sucking"

"Sincerely,

Jeef E. Bonhomme

-Chemistry B.S."

8. As previously stated in paragraph 2, the above facts are not the only facts known at this time. **JEEF BONHOMME** has sent additional letters however; for the purpose of this affidavit only three letters from the one mailed envelope have been detailed.

Conclusion

9. Based on the aforementioned factual information, I respectfully submit that there is probable cause to believe, **JEEF BONHOMME** has violated Title 18 United States Code 876(c), which provides that it is unlawful to knowingly cause to be delivered in any post office or authorized depository for mail matter, to be sent or delivered by the Postal Service according to the direction thereon, any communication with or without a name or designating mark subscribed thereto, addressed to any other person and containing any threat to kidnap any person or any threat to injure the person of the addressee or of another.